## 93 RF 4237

# **G&G** ROCKY FLATS

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G ROCKY FLATS, INC. LIKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

April 6, 1993

93-RF-4237

James K. Hartman

Asst. Manager Environmental Management

DOE, RFO

INTERAGENCY AGREEMENT TABLE 6 MILESTONE EXTENSION FOR OPERABLE UNIT 4 DRAFT AND FINAL PHASE I RFI/RI REPORTS - RLB-158-93

EG&G Rocky Flats, Inc. is hereby transmitting the appropriate documentation for justification of an Interagency Agreement (IAG) Table 6 Milestone extension for Operable Unit 4 (OU-4) draft and final Phase I RFI/RI Reports. The documentation consists of a letter from the U. S. Department of Energy (DOE) to the Colorado Department of Health (CDH) and the U. S. Environmental Protection Agency (EPA) and seven attachments which provide sufficient back-up justification.

The IAG milestones for the OU-4 draft and final Phase I RFI/RI Reports are May 21, 1993 and October 18, 1993, respectively. The requested "target" extension submission dates for the draft and final reports are March 17, 1994 and August 17, 1994, respectively. EG&G Rocky Flats has incorporated one month of contingency time into the OU-4 Phase I RFI/RI Schedule, which reflects a "commitment" extension submission date for the draft and final reports of April 17, 1994 and September 17, 1994. The contingency time has been incorporated into the OU-4 schedule due to uncertainties associated with laboratory analytical durations, data validation and regulatory agency document review periods.

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TO: APT

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostdiek 520
DATE 4-12-93

a-8504-001553

James K. Hartman April 6, 1993 93-RF-4237 Page 2

I trust this information will be adequate to support a request for an IAG milestone extension. If you have any questions or concerns pertaining to this matter, please contact R. T. Ogg on 966-8608.

R. L. Benedetti

Associate General Manager

**Environmental Restoration Management** 

EG&G Rocky Flats, Inc.

RTO:apt

Orig. and 1 cc - J. K. Hartman

Attachment:

As Stated

cc:

S. Howard	- E	DOE,	RFO
F. R. Lockhart	-	"	"
A. H. Pauole	-	r.	"
R. J. Schassburg	er-	"	"
S. R. Surovchak	_	"	"

# **NOTICE:**

# INCOMPLETE DOCUMENT

The following document is missing 2 pages. This document was distributed in an incomplete state, and the microform copy is representative of the paper copy. If replacement pages are distributed, they will be microfilmed and included in the Administrative Record file.

April 5, 1993

Environmental Protection Agency/Colorado Department of Health

Re: Request for IAG Extension of OU4 Draft and Final Phase I RFI/RI Reports

Dear	:

The U.S. Department of Energy (DOE) has experienced significant delays to the Operable Unit No. 4 (OU4) Solar Evaporation Ponds (SEP) Phase I RFI/RI Program. This letter provides a basis for requesting milestone extensions for the submittal of the OU4 Draft and Final Phase I RFI/RI reports. Reasons for these delays include the following:

- Unanticipated requirements associated with the logistics of field mobilization;
- Discrepancies between the Interagency Agreement (IAG) schedule assumptions for OU4 and the actual durations incurred; and
- Delays caused by the conditional approval of the OU4 Final Phase I RFI/RI Work Plan.

Such delays have combined to a total duration of 18 months. However, diligent efforts have allowed the recovery of several months, resulting in a maximum schedule delay of 11 months, reflected in the commitment schedule, and a targeted schedule delay of 10 months, reflected in the target schedule. The target schedule represents the DOE's best estimate for submitting the Phase I RFI/RI Draft and Final Reports. The commitment schedule reflects contingencies for potential delays occurring beyond the control of the DOE. The DOE believes that all future OU4 milestones can potentially be met on schedule, provided U.S. Environmental Protection Agency (EPA) and Colorado Department of Health (CDH) support the OU4 IAG compliance strategy which is attached to this letter.

In accordance with the Rocky Flats Plant (RFP) IAG, signed by the DOE, EPA and CDH on January 22, 1991, the DOE is hereby requesting an IAG Table 6 milestone extension for OU4 SEP for the Draft Phase I RFI/RI Report and the Final Phase I RFI/RI Report. The IAG milestone extension is requested per "Chapter I, Part 42 Extensions, Paragraphs 221-227," of the IAG. The current IAG milestones for the OU4 Draft Phase I RFI/RI Report and Final Phase I RFI/RI Report are May 21, 1993 and October 18, 1993, respectively. The proposed submission dates for the two referenced documents are as follows:

TARGET SCHEDULE

COMMITMENT SCHEDULE

Draft Phase I RFI/RI Report

March 17, 1994

April 17, 1994

Final Phase I RFI/RI Report

August 17, 1994

September 17, 1994

EPA/CDH April 5, 1993 Page 2

The total cumulative delay incurred during the OU4 Phase I RFI/RI Program is as follows:

Reasons	Schedule Delay
Unanticipated Mobilization Requirements	3 Months
Outdated IAG Assumptions	11 Months
OU4 Phase I RFI/RI Work Plan Approval Delay	4 Months
Total Cumulative Delay	18 Months

The DOE has taken every effort to mitigate the delay by assigning additional resources and conducting many tasks in parallel. However, logistics within the RFP and PA prevent the utilization of unlimited resources. Nevertheless, a total reduction of eight months delay is targeted, resulting in a net delay of 10 months.

The following seven attachments accompany this letter for your reference:

- Attachment A Milestone Extension Rationale;
- Attachment B OU4 Solar Ponds Phase I RFI/RI Target Schedule;
- Attachment C OU4 Solar Ponds Phase I RFI/RI Commitment Schedule;
- Attachment D OU4 Phase I RFI/RI Project;
- Attachment E OU4 Timeline of Events;
- Attachment F OU4 Solar Ponds Strategy for IAG Compliance; and
- Attachment G OU4 Critical Schedule Assumptions.

The DOE requests a meeting with EPA and CDH to discuss these issues in detail at the earliest convenient time. Please feel free to contact me if you have any questions or comments pertaining to this matter.

Sincerely,

DOE-RFO

EPA/CDH.WP2(WP51)

### ATTACHMENT A - MILESTONE EXTENSION RATIONALE

The DOE's justification and rationale for requesting these IAG milestone extensions consist of the following reasons.

### MOBILIZATION DELAYS

Unanticipated tasks were required for mobilization of the OU4 Phase I RFI/RI Field Program. Although DOE and EG&G Rocky Flats, Inc. (EG&G) expected numerous and complicated logistics for mobilization, it was not anticipated to require four months (August 3, 1992 - December 14, 1992). The RFP IAG allows one month for all RFI/RI mobilization tasks. The following list details requirements for mobilization of the OU4 Phase I RFI/RI Program.

### 1) Training:

- General Employee Training;
- Radiation Worker Training;
- Radiation Protection Training;
- Respirator Fit Test and Training;
- Building Indoctrination;
- Radio Communication Training;
- Standard Operating Procedure Training;
- Core Logging Training;
- Decontamination Pad Training;
- Drum Training; and
- Data Management Training.

### 2) General Permits:

- Integrated Work Control Package Waiver;
- Land Use Request;
- Buffer Zone Passes;
- Badges and Dosimeters; and
- Soil Disturbance Permit.

### 3) Equipment Procurement:

- Field Trucks:
- Drilling Rigs;
- Personal Protective Equipment;
- Decontamination Supplies;
- Radiation Detectors;
- Core Logging Supplies;
- Soil Sampling Equipment; and
- Vadose Zone Monitoring Equipment.

### 4) Documentation Requirements:

- Implementation Plan;
- Health and Safety Plan; and
- Vadose Zone Technical Memorandum.

### 5) Health and Safety:

- Equipment Calibration;
- Radiation Survey of Equipment;
- Property Transfer Forms; and
- Radiation Work Permits.

# ATTACHMENT A (continued)

The target and commitment schedules include the mobilization tasks, durations of the tasks, and start and finish dates. Additional complications and impacts which are not referenced in the attached schedules include:

- Numerous coordination meetings with various support organizations for OU4;
- In October 1992, the SEP IHSS 101 was designated a Radiological Controlled Area (RCA). The designation of the Ponds as an RCA has created additional health and safety requirements and logistics;
- Support equipment, including a field trailer, equipment storage facilities, and radiation instrumentation was extremely difficult to obtain due to the number of remedial investigations being conducted simultaneously at RFP; and
- The security requirements associated with accessing the RFP Protected Area (PA) are extremely time consuming.

The total delays incurred for the OU4 mobilization tasks amount to three months.

### IAG ASSUMPTIONS

Critical IAG assumptions relative to activity durations were used for planning and implementing the OU4 Phase I RFI/RI field program which are no longer accurate or valid. Specific examples of durations exceeding the IAG durations for critical path activities include:

Critical Path Activities	IAG <u>Duration</u>	Schedule Duration	Incremental <u>Delay</u>	Cumulative Incremental <u>Delay</u>
Procurement (OU4 Work Plan Implementation)	0 days	126 daysa	126 days	126 days
Vadose Zone Instrumentation (16 boreholes at two days per borehole)	0 days	32 days²	32 days	158 days
Radiological Analysis	63 days	75 daysb	12 days	170 days
Data Validation	21 days	45 days <sup>b</sup>	24 days	194 days
Baseline Risk Assessment (Toxicity Tech Memo on Critical Path)	0 days	35 daysb	35 days	229 days (total)

a = actual b = target schedule

In general, a number of critical path activities were either not included or were assumed in the IAG to require less time than what was actually necessary for the OU4 implementation. Consequently, these activities have contributed to the OU4 Phase I RFI/RI schedule delay by approximately 229 working days or 11 months.

# ATTACHMENT A (continued)

### WORK PLAN APPROVAL

The OU4 Draft Final Phase I Work Plan was submitted to CDH and EPA on November 26, 1991. Regulatory agency correspondence was received on December 20, 1992 indicating the work plan was not approved. The revised OU4 work plan was submitted to CDH and EPA on February 5, 1992. The statement of work (SOW) for implementation of the work plan was transmitted to procurement on February 14, 1992 as a competitive bid contract. Conditional approval for the OU4 Final Phase I RFI/RI Work Plan was received from CDH and EPA on May 8, 1992. Consequently, OU4 work plan approval process delayed the procurement of the OU4 implementation. The DOE and EG&G did not believe it would be cost effective for a subcontractor to propose on the implementation of the unapproved OU4 Work Plan. The total delay incurred from the OU4 Work Plan approval process was four months.

### MAR MAR 63 93 FEB FEB 93 93 NAL N CDH/EPA Conditional Approval on TM No. 1 93 93 DEC DEC 8 92 submitted to CDHÆPA Draft TM NO V > 0N So. I 11/16/92 CDII/EPA letter reminding DOE 35 of need to approve Vadose Zone TM. Work Plan status remains 3 Conditionally Approved 8 6 g 92 **OU4 TIMELINE OF EVENTS** SEP SEP 3 92 Response to Comments DOE/RFO Award of ATTACHMENT E Contract AUG AUG 32 Revision submitted 8 (Technical Evaluation) Negotiations Final Work Plan to CDIVEPA were held JUL Ę 92 8 Fransmitted to Procurement NO. NS. 92 conditional approval of Final Work Plan 6 CDIVEPA grant Proposals Received extended the proposal due date for bidders MAY MAY EG&G-RPD 6 92 by I week RFP was released recommending conditional approval of Final Work Plan to the potential subcontractors EPA letter to CDH APR APR 35 35 3/16/92 MAR Draft Final Work Plan MAR 92 SOW submitted Revision Pages to procurement to CDIVEPA submitted 2/14/92 FEB E:E approved by CDH/EPA 35 Work Plan not 92 CDH Letter received .-- Draft Draft Final Final Work Plan approval Resolution of Deficiencies 11/26/91 12/20/91 1/6/92 Submit Draft Fina withheld pending Ν N 35 35 Revised Draft Final Work Plan to CDHVEPA DEC DEC 91 6 REGULATORY PROCESS NOV NOV 91 PROCUREMENT comments received. Praft Work Plan not approved CDIMERA 5 QC1 9 16/01/6 6 SEP SEP 16 91

### ATTACHMENT F - OU4 SOLAR PONDS STRATEGY FOR IAG COMPLIANCE

The DOE-RFO, DOE Headquarters, and EG&G consider OU4 SEP program to be of extraordinarily high priority at RFP for remedial activities. Substantial DOE and EG&G resources have been allocated to the SEP program. Due to the high priority of this project, the DOE has developed a plan to potentially recover the IAG schedule. However, it is important to understand and recognize that this approach is extremely aggressive and costly, and may not be feasible for other OUs.

The following figure represents the DOE's strategy which reflects "full-recovery" of the IAG subsequent to the OU4 Final Phase I RFI/RI Report. The DOE believes that the Interim Measure/Interim Remedial Action (IM/IRA) Decision Document, IM Design and Construction and Phase II IAG requirements can all be met with the support from EPA and CDH. The DOE and EG&G will have a contract awarded under the Master Task Subcontract (MTS) program in June 1993 which will include the following IAG requirements:

- Treatability Study (if applicable);
- IM/IRA Decision Document;
- Phase II RFI/RI Work Plans (Draft and Final);
- Phase II RFI/RI field activities; and
- Phase II RFI/RI Reports (Draft and Final).

By integrating these functions into one contract, the DOE and EG&G can save approximately 376 working days in procurement time and create a more efficient program by utilizing one team of contractors rather than multiple contractors for various requirements. The DOE believes that this approach will potentially allow compliance with the IAG. Enforcement of fines and penalties would only consume resources required for the remaining OU4 IAG activities.

# ATTACHMENT B

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11/30/92		ETA/COH Review	6
11/16/92		I ransmit to CDH/EPA	45
11/16/92		DOE/EG&G Final Combined Review	44
11/12/92	2d 11	Transmittal Processing - DOE/RFO	43
11/10/92		Incorporate Comments	42
10/30/92		EG&G/DOE Review	41
10/13/92		Submit Draft Tech Memo to EG&G/DOE	40
		Prepare Tech Memo	39
		Vadose Zone, Tech Memo No. 1 & SOPS	38
10/23/92		W	37
10/9/92		Submit Final Plan	36
10/9/92		Finalize Plan	35
9/24/92		EG&G Review	34
		Prepare Plan	33
8/13/92 10/23/92		Health & Safety Plan	32
		PROJECT PLANNING	31
	<u></u>	Submit Last Months Form	30
8/28/92		Submit First Months Form	29
9/21/94		Justification for Visit Forms	28
		Stop Progress Tracking	27
	6d	Start Progress Tracking	26
10		Bi-weekly Progress Tracking & Reports	25
	0d 10	Submit Last Report	24
8/21/92		Submit First Report	23
		Monthly Accrual Cost Tracking	22
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### ATTACHMENT G - CRITICAL SCHEDULE ASSUMPTIONS

HORIZONTAL DRILLING - In the event horizontal drilling is required, the target and committment schedules will require revision. Revisions will reflect the additional time necessary to develop a related plan, to mobilize new equipment, and to perform the work.

**DOCUMENTATION REVIEW** - All agency review cycles, as referenced in the attached schedule, must be maintained.

LABORATORY DURATIONS - Radiological analysis are assumed to require 75 working days, as referenced in the Target schedule.

**DATA VALIDATION** - Data Validation is assumed to require 45 days, as referenced in the target schedule.

**TECHNICAL MEMORANDA** - It is assumed that only those technical memoranda currently identified in the schedule will be required.

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${}$	3/19/93 185SS+2w	3/11/93	4/26/93	<b>—</b> ∔	4/23/93   189SS+2w			5/7/93   177FF	7/29/93	11/18/92 164SS+1w	7/29/93 204FF-1w	$\overline{}$	_		6/17/93 199			7/8/93   200FS-3w	8/5/93   203,188,183,177,173,169,166		12/31/93	8/17/93			5/25/93 1/UFS+60d	6/15/93 12/14/02 170SS	-		3/5/93 209ES+60d		+	3/26/93 212FS+75d	6/15/93 213			7/27/93 216FS+45d	-	$\rightarrow$	8/17/93 219FS+45d	$\vdash$	5/7/93   221FS+45d	-	8/17/93	_	8/17/93   225	7/20/93	4/27/93	
Н	1/27/93	3/3/93	1/8/93	1/8/93	1/22/93	2/22/93	4/20/93	4/26/93	11/18/92	11/18/92	7/29/93	3/22/93	3/22/93	4/23/93	5/1/93	4/26/93	4/26/93	5/28/93	7/9/93	-	12/14/92	12/14/92	12/14/92	12/14/92	56/57/5	12/14/92	2014172	3/5/93	3/5/93	5/25/93	3/26/93	3/26/93	6/12/93	3/5/93	3/5/93	7/27/93	3/26/93	3/26/93	8/17/93	5/7/93	5/7/93	7/27/93	5/28/93	5/28/93	8/17/93	12/28/92	12/28/92	PAGE 4
Duration	7.6w	1.4w	p22	15.4w	13.2w	Pg 3d	1w	2w	181d	P0	PO	64d	4.8w	2w	θw	760d	52w	ew 9	4w		275d	176.5d	116.5d	8	DO 7.07	131.00	3 3	56.50	200	В	56.5d	p0	용	101.5d	В	В	101.5d	8	p0	26.5d	p0	PO PO	26.5d	P0	P0	147d	<b>87</b> d	
	Core Logging	Vadose Zone Monitoring Installation	Radiologically Controlled Area (RCA) (xb,xv,xi,xp)	Borehole Drilling & Sampling	Core Logging	Vadose Zone Monitoring Installation	Drum Sampling	Seismic Reflection/Refraction	Land Survey	Start Land Survey	Finish Land Survey	Other Vadose	Guelph Permeameter Tests	Soil Gas Survey	Infiltrometer Installation	Vadose Monitoring Activities	Lysimeter Sampling	Infiltrometer Testing	Demobilization		LAB ANALYSIS/TURNAROUND		Non Kad Data Lab Analysis/ lumaround	First Sample	Last Sample	Kad Data Lab Analysis/Turnaround First Samole	l act Sample	Receive Unvalidated Non Rad Data	Receive First	Receive Last	Receive Unvalidated Rad Data	Receive First	Receive Last	Validate Non Rad Data	Begin	End	Validate Rad Data	Begin	End	Receive Validated Non Rad Data	Receive First	Receive Last	Receive Validated Rad Data	Receive First	Receive Last	Interceptor Trench System	Non Rad Data Lab Analysis/Turnaround	4/2/93 7:38 AM SCHDTRGT.MPP
Task Name																					≤			$\perp$			L			L																		•

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Sched Fin Predecessors	76/02/7	5/18/93		5/18/93	4/27/93	3/19/93		5/18/93	4/9/93		6/29/93	3/19/93	3 6/29/93 241FS+45d	7/20/93	4/9/93		6/58/93	5/21/93		13 7/20/93	33 6/11/93 249FS+45d	-	٠ <u>/</u>	7/5/93	3/10/93		13 (123)93 13 210,03 190SS	7/23/03	7/5/93		7/5/93	7/23/93	6/22/93		86/9/6	6/1/93		9/24/93	6/22/93	<u> </u>	66/9/6	8/3/93		9/24/93		9/24/93
12/28/02							,												6/29/93	6/11/93					<u></u>		3/10/93													6						9/24/93
Duration	PO PO	102d	P0	PO PO	27d	p0	p0	27d	P0	p0	72d	P0	00	72d	00	00	27d	P0	P0	27d	p0	PO	143d	840	po po	D1	DRA	PO	240	p0	P0	23d	P0	00	P69	PO	0	089	PO -	P0	24d	P0	P0	23d	P0	P0
First Sample	List Sample	Rad Data Lab Analysis/Turnaround	First Sample	Last Sample	Receive Unvalidated Non Rad Data	Receive First	Receive Last	Receive Unvalidated Rad Data	Receive First	Receive Last	Validate Non Rad Data	Begin	End	Validate Rad Data	Begin	End	Receive Validated Non Rad Data	Receive First	Receive Last	Receive Validated Rad Data	Receive First	Receive Last		Non Rad Data Lab Analysis/ Iurnaround	First Sample	Dod Dotal ob Anglacie (Tumoraning	Rad Data Lab Analysis/Tumaround	l ast Sample	Receive Unvalidated Non Rad Data	Receive First	Receive Last	Receive Unvalidated Rad Data	Receive First	Receive Last	Validate Non Rad Data	Regin	End	Validate Kad Data	Begin	End	Receive Validated Non Rad Data	Receive First	Receive Last	Receive Validated Rad Data	Receive First	Receive Last
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Earthen Ponds Non Rad Data Lab Analysis/Turnaround First Sample	7777	100/01/1		
		1/13/03	6/24/93	
	PO	1/13/93	1/13/93	185SS
Last Sampla	PO	6/24/93	6/24/93	-
Rad Data Lab Analysis/Turnaround	132d	1/13/93	7/15/93	
First Sample	P0	1/13/93	1/13/93	
Last Sample	P0	7/15/93	7/15/93	185FS+75d
Receive Unvalidated Non Rad Data	27d	4/6/93	6/24/93	
Receive First	p0	4/6/93	4/6/93	
Receive Last	PO	6/24/93	6/24/93	285
Receive Unvalidated Rad Data	57d	4/27/93	7/15/93	-+
Receive First	p0	4/27/93	4/27/93	$\rightarrow$
Receive Last	Po	7/15/93	7/15/93	288
Validate Non Rad Data	102d	4/6/93	8/26/93	-+
Begin	P0	4/6/93	4/6/93	
End	po	8/26/93	8/26/93	291FS+45d
Validate Rad Data	102d	4/27/93	9/16/93	-
Begin	po po	4/27/93	4/27/93	_
End	p0	9/16/93	9/16/93	294FS+45d
Receive Validated Non Rad Data	27d	6/8/93	8/26/93	-
Receive First	P0	6/8/93	6/8/93	-
Receive Last	P0	8/26/93	8/26/93	297
Receive Validated Rad Data	P29	6/53/93	9/16/93	-+
Receive First	P0	6/29/93	6/29/93	
Receive Last	P0	9/16/93	9/16/93	300
Radiologically Controlled Area (RCA)	197d	1/8/93	10/11/93	
Non Rad Data Lab Analysis/Tumaround	137d	1/8/93	7/19/93	$\rightarrow$
First Sample	P0	1/8/93	1/8/93	
Last Sample	PO PO	7/19/93	7/19/93	189FS+60d
Rad Data Lab Analysis/Turnaround	152d	1/8/93	8/9/93	-+
First Sample	РО .	1/8/93	1/8/93	→
Last Sample	P0	8/9/93	8/9/93	189FS+75d
Receive Unvalidated Non Rad Data	p22	4/1/93	7/19/93	-+
Receive First	PO PO	4/1/93	4/1/93	-+
Receive Last	P0	7/19/93	7/19/93	310
Receive Unvalidated Rad Data	1/d	4/22/93	8/6/83	-+
Receive First	00	4/22/93	4/22/93	-+
Receive Last	500	8/6/63	8/8/83	3 313
Validate Non Rad Data	D77L	4/1/93	8/20/93	-+
Begin	BO S	4/1/93	4/1/93	313 34658±464
End Vallation of the tea	DO 19201	9/20/93	10/11/03	+
Validate Kad Data	7771	100000	00/00/4	240
Begin	900	4/2/93	4/22/93	-
End	71.	20/0/0	26/11/01	+
Receive Validated Non Rad Data	D//	6/3/93	8/07/83	-
Receive First	00	6/3/93	6/3/83	$\rightarrow$
Receive Last	pn Pn	9/20/93	9/20/93	3 322
Receive Validated Rad Data	[b//	6/24/93	10/11/93	3

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Duration	118.5d	P0	PO	202d	106.5d	8	B	P2.2	P0	РО	P£2	P0	P0	107d	P0	P0	127d	P0	PO	115.5d	P0	P0	248d	91d	w8.9	PO PO	10d	5d	РО	2d	20d	10d	8	10d	D/6	Mo S	DO F	201	3 3	000	D7	D07	000	200	919	2 6	80	
Task Name	Environmental Evaluation	Start	Finish	Evaluate Rad Data	Around Ponds	Start	Finish	13	Start	Finish	Pond 207A	Start	Finish	Earthen Ponds	Start	Finish	Radiologically Controlled Area (RCA)	Start	Finish	Environmental Evaluation	Start	Finish	Human Health Risk Assessment	Exposure Assessment - TM4	Prepare Tech Memo	Submit Draft Tech Memo to EG&G/DOE	EG&G/DOE Review	Incorporate Comments	Submit Revised Draft Tech Memo	Transmittal Processing - EPA/CDH	EPA/CDH Review	Resolve Comments and Finalize TM	Submit Final lech Memo	EPA/CDH Final Approval	EXPOSURE ASSESSMENT MODEIS - I MO	Submit Traff Took Mamo to ECRONOE	Capilli Dial 1 tech mello to Concilion	Incompate Comments	Submit Draft Took Mono	Commit and 1 Tech Mento Technik and 1 Techni	FDA/CDH Review	Docolus On Final Took Mono	Submit Einal Tark Mamo	EDAINE Tide Toor Incino	Contaminants of Concern - TM6	Prenare Terh Memo	Submit Draft Tech Memo to EG&G/DOE	4/2/93 7:38 AM SCHDTRGT.MPP
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Duration	10d	p6	P0	2d	70d	10d	PO	10d	82d	Ava	M+	BO S	10d	10d	0q	2d	20d	10d	po Od	10d	494d	6.5w	8w	м6	<b>%</b> 6	45d	30d	θм	3d	9w	2w	55d	1w	1w	Jw	5w	453d	106d	3w	15d	55d	po Po	po Od		260d	27.2w	35d	270d	po Od	
Task Name	426 EG&G/DOE Review		428 Submit Revised Draft Tech Memo						Toxi				437 EG&G/DOE Review	438 Incorporate Comments	439 Submit Draft Tech Memo			442 Resolve Comments and Finalize Tech Memo	443 Submit Final Tech Memo	444 EPA/CDH Final Approval	Environmental								453 Animal Survey			456 Ecotoxicological Investigation	457 Soil Pits/Sampling	458 Small Mammal Sampling	459 Vegetation Sampling		461 EE Portion of BRA	EEF			465 Ecotoxicological Report	466 Start Report		468	469 DATA EVALUATION & REPORT PREPARATION	470 Collect Historic Data	471 Evaluate Historic Data	472 Prepare Draft Phase I RFI/RI Report		4/2/93 7:38 AM SCHDTRGT.MPP
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	OU4 SOL	ILAR PONDS PHASE I RFI/RI TARGET SCHEDULE	HEDULE			
9	Task Name	Duration	Sched St	Sch	Predecessors	
474	Transmittal Processing to DOE/HQ	pg 20			$\rightarrow$	
475	DOE-HQ Review of Draft RFI/RI Report	21d			$\rightarrow$	
476	EG&G/DOE-RFO Review of Draft RFI/RI Report	21d			$\rightarrow$	
477	Incorporate Comments and Finalize	21d			475,476	
478	Transmittal Processing to EPA/CDH	5d			477	
479	Submit Draft RFI/RI Report to EPA/CDH	P0			478	_
480	EPA/CDH Review Draft RFI/RI Report	62d			479	
481	Receive EPA/CDH Comments	p0			480	
482	Incorporate Comments and Finalize	42d			481	
483	Transmittal Processing	ps 20			482	
484	Submit Final RFI/RI Report	p0			483	
485	EPA/CDH Review of Final RFI/RI Report	210			484	
486	Receive Comments from EPA/CDH	p0			485	
487	Incorporate Comments and Finalize Report	25d			486	
488	Transmittal Processing to EPA/CDH	PS 2d			487	
489	EPA/CDH Final Approval	P0	10/27/94	94 10/27/94	488	
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		PO	12/15/92	12/15/92	
	Transmit Final TM to CDH/EPA	p0	12/15/92	12/15/92	48
	EPA/CDH Final Approval	18w	12/16/92	4/20/93	50
	Modifications to Field Activities, Tech Memo No. 2	P86	1/26/93	6/10/93	
L	EPA/CDH Meeting - Approval to Proceed w/ TM	19	1/26/93	1/26/93	
L		3.3w	1/27/93	2/18/93	53
	Submit Draft TM to EG&G/DOE	PO	2/18/93	2/18/93	54
		39	2/18/93	2/23/93	+-
	Incorporate Comments and Expand Memo	2.9w	2/23/93	3/15/93	
	Submit Revised Draft TM to EGRC/DOF	100	3/15/03	3/15/03	
1	FG&G/DOF Review	200	3/16/93	3/29/93	
	Incomprate Commants	1 24	3/30/03	A/6/03	50
	Transmittel Processing - EDA/COH	PC	4/7/93	4/8/03	
	EDA/COL Poviow	D7	4/0/03	5/6/03	
	Description Comments 9 Cincline Tech Memo	š (	50177	00/00/2	
		M7	20000	20,000	
	Submit Final I M	Od	5/02/93	5/70/93	
	EPA/CDH Final Approval	3w	5/21/93	6/10/93	64
	Environmental Evaluation, Tech Memo No. 3	190.5d	8/19/92	5/12/93	
	Prepare EE Working Document	82d	8/19/92	12/10/92	16
	Submit Draft EEWD to EG&G	PO	12/10/92	12/10/92	29
	EG&G Review	4w	12/11/92	1/7/93	89
L	Incorporate Comments into EEWP	0.2w	1/8/93	1/8/93	69
	Submit Revised Draft EEWD to EG&G/DOE	P0	1/8/93	1/8/93	
		3%	1/8/93	1/28/93	
	Prepare Draft EE Tech Memo	4.8w	1/14/93	2/16/93	70
	Submit Draft EE Tech Memo to EG&G/DOE	P0	2/16/93	2/16/93	73
	EG&G/DOE Review	2.7w	2/16/93	3/5/93	
	Incorporate Comments into TM	4	3/5/93	3/12/93	75
	Submit Revised EE Tech Memo to EG&G/DOE	В	3/12/93	3/12/93	76
	Transmittal Processing - EPA/CDH	19	3/12/93	3/15/93	
	EPA/CDH Review	4w	3/15/93	4/12/93	78
	EPA/CDH Conditional Approval for FF Tech Memo	20	4/12/93	4/12/93	
	Resolve Comments & Finalize Tech Memo	100	4/12/03	4/10/03	
	Submit Final FF Tech Memo to ECRC/DOF	50	4/40/03	4/40/03	
		2	4/19/93	4/19/93	
	TONION TO CONTRACTOR	707	26/87/4	4/21/93	
	T	WC C	4/21/93	56/71/6	83
	Dilling 1	Dagi	8/3/92	3/24/93	15
	General Employee Training	154d	8/18/92	3/19/93	
	First Class	4	8/18/92	8/18/92	
	Last Class	<u>ස</u>	3/19/93	3/19/93	
	Radiation Worker Training	156d	8/19/92	3/24/93	
	First Class	14	8/19/92	8/19/92	
	Last Class	10	3/24/93	3/24/93	
	Radiation Protection Training	34	9/3/92	9/7/92	
	September 3rd Class	34	6/3/62	9/7/92	
	Respirator Fit Test & Training	334	8/27/92	40/12/92	
	First Fit	44	8/27/92	8/27/92	
	act Fit	4	40/42/02	40/42/02	

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D	Building Indoctination 80	98 FIRST INDOCUMENTON CONTRACTOR	Radio Communication Training	Firet Training	Last Training	SOP Training	First Training	Last Training	106 Core Logging Training 75d	109 Decontamination Pad Training 0.1w		RFEDS Training 16	Site Base Map Preparation	Mobilization	151 Plan of the day meetings 455d	15C FIELDMADDY 270A	LIELDWORN	130 Ground Water Level Measurements 14W			9	Start Survey 0d	Finish Survey 0d	OU Wide Radiological Survey 100d				£.	Around Donds (Ar v. v. v.)	Borehole Drilling and Sampling/Piezometer Installation 11.3w		Monitoring Installation		ing and Sampling/Piezometer Installation		toring Installation		Survey		ng and Sampling			Ungilial Ponds (xb,xv,xi,xp)		Borehole Urilling & Sampling

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	7.6w	1/27/93	3/19/93	Predecessors 185SS+2w
	1.4w	3/3/93	3/11/93	-
	D// 41	1/8/93	4/26/93	
Core Logging	13.4W	1/22/03	4/26/93	
Vadose Zone Monitoring Installation	34	2/22/93	2/24/93	WZ+CC601
Drum Sampling	Jw.	4/20/93	4/26/93	189FE
Seistific Kellection/Kefraction	2w	4/26/93	5/7/93	~-
Charle Sulvey	181d	11/18/92	7/29/93	
Finish   and Change	PO	11/18/92	11/18/92	164SS+1w
Other Vadose	PO PO	7/29/93	7/29/93	204FF-1w
Guelph Dermeamotor Toots	640	3/22/93	6/17/93	
Soil Gas Survey	4.8w	3/22/93	4/22/93	182SS
Infiltromater Installation	ZW	4/23/93	2/6/93	198
	Mg	5/7/93	6/11/93	199
	260d	4/26/93	4/22/94	
Infiltromotor Toding	52w	4/26/93	4/22/94	182FS+3.4w
Demobilization	θw	5/28/93	7/8/93	200FS-3w
	4w	2/6/63	8/2/83	203,188,183,177,173,169,166
LAB ANALYSIS/TIJRNAROLIND				
Around Ponds	295d	12/14/92	1/28/94	
Non Rad Data Lab Analysis/Trimaround	196.5d	12/14/92	9/14/93	
	116.50	12/14/92		
Last Sample	000	12/14/92	_	170SS
Rad Data Lab Analysis/Tumaround	00 146 Ed	56/57/6		170FS+60d
First Sample	140.30	12/14/92	_	A
Last Sample	88	7/8/03/	76/6/7/2	1/055
Receive Unvalidated Non Rad Data	26 50	3/5/02	-	1/0FS+90G
Receive First	20.00	3/5/03		1 00 01000
Receive Last	2	00/2012		Z09FS+60d
Receive Unvalidated Rad Data	000	3/23/93	_	210
	00.00	4/16/93		
Receive Last	3 3	4/16/93		212FS+90d
Validate Non Rad Data	40c Ed	1/0/93	-+	213
Begin	00.001	3/2/93		
End	000	3/3/83	_	215
Validate Rad Data	700	6/3/93	-+	216FS+50d
Begin	20.00	4/16/93	-+	
End	3	4/16/93	-	218
Receive Validated Non Rad Data	DO 23	9/ 14/93	-	219FS+50d
Receive First	00.00	2/14/93	-+	
Receive Last	0	0/14/93		221FS+50d
Receive Validated Rad Data	26 54	6/26/93	-	77.7
Receive First	00.00	0/22/93		
Receive Last	3	56/27/9		224FS+50d
Interceptor Trench System	00	9/14/93		225
Non Rad Data Lab Analysis/Turnaround	0701	12/8/92	8/17/93	
	775	78/97/71	4/27/03	

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Task Name         First Sample         Duration         Check State         School         4728802         1728802																					-																											
First Sample         Duration         Sched St         Sched Fin           Last Sample         Last Sample         17/28/92         12/28/92         17/28/92         17/28/92         17/28/92         17/28/92         17/28/92         17/28/92         17/28/92         17/28/92         18/28/93         18/28/93	Predecessors	174SS	174FS+60d		174SS	174FS+90d		234FS+60d	235		237FS+90d	238		240	241FS+50d		243	244FS+50d		246FS+50d	247		249FS+50d	250			180SS	180FS+60d	4000	18033	100131300	259FS+60d	260		262FS+90d	263		265	266FS+50d		268	269FS+50d		271FS+50d	272		274FS+50d	275
First Sample		12/28/92	4/27/93	6/8/93	12/28/92	6/8/93	4/27/93	3/19/93	4/27/93	6/8/93		-	26/9/		-	8/17/93	4/30/93	8/17/93	2/9/2	5/28/93		$\vdash$			10/22/93			7/5/93	8/13/93	3/10/93	7/5/93	6/1/93		$\overline{}$	7/13/93	8/13/93						$\rightarrow$	9/13/93	8/10/93	9/13/93	_		-
First Sample Last Sample Receive Last Receive Last Receive Last Receive First Receive First Receive First Receive Last Receive La	Sched St	12/28/92	4/27/93	12/28/92	12/28/92	6/8/93	3/19/93	3/19/93	4/27/93	4/30/93	4/30/93	6/8/93	3/19/93	3/19/93	26/9/	4/30/93	4/30/93	8/17/93	5/28/93	5/28/93	7/6/93	2/6/2	2/6/63	8/17/93	3/10/93	3/10/93	3/10/93	7/5/93	3/10/93	3/10/93	6/1/93	6/1/93	7/5/93	7/13/93	7/13/93	8/13/93	6/1/93	6/1/93	9/13/93	7/13/93	7/13/93	10/22/93	8/10/93	8/10/93	9/13/93	9/21/93	9/21/93	10/22/93
First Sample Last Sample Last Sample Last Sample East Sample East Sample Receive First Receive Last Sample End Begin Receive First Receive First Receive First Receive First Receive Last Receive First	Duration	РО	po	117d	PO PO	8	27d	PO	PO	27d	P0	p0	17d	P0	po 0	77d	po Od	ро	27d	P0	P0	27d	P0	В	163d	84d	РО	10	113d	5 6	24d	PO	P0	23d	PO	P0	74d	P0	po	730	PO DO	PO	24d	P0	P0	23d	P0	PO
		First Sample	Last Sample	Rad Data Lab Analysis/Turnaround	First Sample	Last Sample	Receive Unvalidated Non Rad Data	Receive First	Receive Last	Receive Unvalidated Rad Data	Receive First	Receive Last	Validate Non Rad Data	Begin	End	Validate Rad Data	Begin	End	Receive Validated Non Rad Data	Receive First	Receive Last	Receive Validated Rad Data	Receive First	Receive Last	Pond 207A	Analysis/Turr	First Sample	Last Sample	Rad Data Lab Analysis/Turnaround	First Sample	Receive Unvalidated Non Rad Data	Receive First	Receive Last	Receive Unvalidated Rad Data	Receive First	Receive Last	Validate Non Rad Data	Begin	End	Validate Rad Data	Begin	End	Receive Validated Non Rad Data	Receive First	Receive Last	Receive Validated Rad Data	Receive First	Receive Last

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Env	Receive First	po od	7/22/93	7/22/93	
	Receive Last Environmental Evaluation	208 5d	11/8/93	11/8/93	325
	Non Rad Data Lab Analysis/Turnaround	128.5d	4/13/93	10/8/93	
	First Sample	P0	4/13/93	4/13/93	
	Last Sample	PO G	10/8/93	10/8/93	456FS+60d
	Kad Data Lab Analysis/Turnaround	158.50	4/13/93	11/19/93	
	First Sample	DO G	4/13/93	4/13/93	
		DO :	11/19/93	11/19/93	456FS+900
	Receive Unvalidated Non Rad Data	68.50	2/9/2	10/8/93	-+
	Kecelve First	pn d	7/6/93	(16/93	
	Receive Last	B	10/8/93	10/8/93	335
	Receive Unvalidated Rad Data	68.5d	8/17/93	11/19/93	-+
	Receive First	В	8/17/93	8/17/93	-
	Receive Last	po or	11/19/93	11/19/93	338
	Validate Non Kad Data	DC.81.1	1/6/93	12/1/93	
	Begin	00	7/6/93	7/6/93	-
	End	РО	12/17/93	12/17/93	341FS+50d
	Validate Rad Data	118.5d	8/17/93	1/28/94	-
	Begin	В	8/17/93	8/17/93	_
		po	1/28/94	1/28/94	344FS+50d
	Receive Validated Non Rad Data	68.5d	9/14/93	12/17/93	
	Receive First	В	9/14/93	9/14/93	
	Receive Last	PO	12/17/93	12/17/93	347
	Receive Validated Rad Data	68.5d	10/26/93	1/28/94	_
	Receive First	p <sub>0</sub>	10/26/93	10/26/93	349FS+50d
	Receive Last	PO	1/28/94	1/28/94	350
ASELIP	BASELINE RISK ASSESSMENT	248d	1/1/92	2/4/94	
Date	Data Collection & Evaluation	371d	9/4/92	2/4/94	
	Collect Historic Data	27.4w	9/4/92	3/15/93	
	Evaluate Historic Data	35d	3/16/93	5/3/93	360
	Evaluate Non-Rad Data	210d	3/5/93	12/24/93	
	Around Ponds	111.5d	3/5/93	8/10/93	
	Start	PO	3/5/93	3/5/93	215SS
	Finish	PO	8/10/93	8/10/93	-
	ITS	82d	3/19/93	7/13/93	
	Start	P0	3/19/93	3/19/93	240
	Finish	P0	7/13/93	7/13/93	253FS+1w
	Pond 207A	P62	6/1/93	9/20/93	
	Start	P0	6/1/93	6/1/93	26555
	Finish	Po	9/20/93	9/20/93	+
	Earthen Ponds	PZ6	4/6/93	8/19/93	+
	Start	В	4/6/93	4/6/93	290SS
	Finish	PO	8/19/93	8/19/93	+-
	Radiologically Controlled Area (RCA)	132d	4/1/93	10/4/93	+
		PO	4/1/93	4/1/93	315SS
	Finish	PO	10/4/93	10/4/93	328FS+1w

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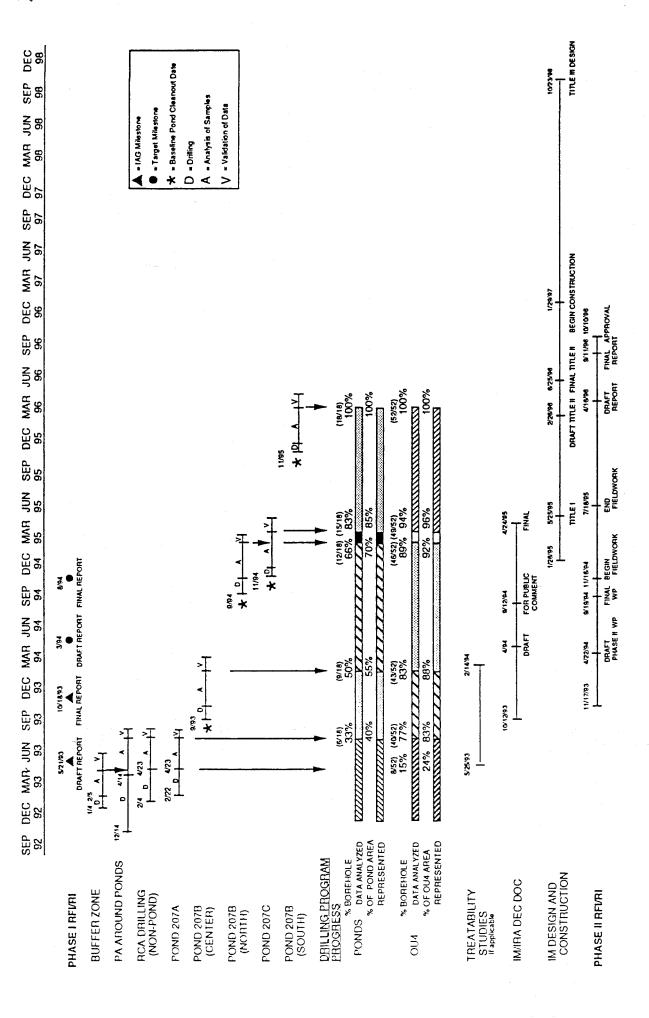
	Sched Fin Predecessors	2/11/94 473	3/14/94 474	0/44/04	3/14/94 4/4	4/12/94 475,476	4/10/04 177	714007	4/18/84 4/8	7/14/94 479	217 100	114/94 480	9/12/94 481	101 1010	3/13/34 487	9/19/94   483	10/18/04 101	100101	11/22/94   485	11/29/94 ARG	44/20/04	11/23/34   48/
Cohod Ct	4	277/94	2/14/94	2/44/04	16/4/17	3/13/94	4/13/94	1/10/07	4/18/84	4/20/94	7/44/04	111134	7/15/94	0/42/04	10000	9/19/94	75/02/6	40/40/04	10/19/94	11/23/94	44/20/04	1120104
Ourotion	Data	2d	21d	244	24.0	017	29	2	3	62d	20	3	42d	2.4	3 3	BN	21d	730	DC7	- 2g	2	3
ID Task Name	Transmittal Processing to DOE/HO	Surgicial Surgic	DOC-TIC REVIEW OF DISTERNING Report	EG&G/DOE-RFO Review of Draft RFI/RI Report	Incorporate Comments and Finalize		Talishinkal Flocessing	Submit Draft RFI/RI Report to EPA/CDH	FDA/CDU Povicos Drad Del/DI Do. 1	El CODI NEVIEW DIBIR NEVIN NEPOR	Receive EPA/CDH Comments on Draft RFI/RI Report	Incorporate Commonts and Finalis	Incorporate Comments and Finance	Iransmittal Processing	Submit Final RFI/RI Report	EDA/ON Doving of Fig. 1 Print B	LT ACON NEVIEW OF FINAL REPORT	Incorporate Comments and Finalize REI/RI Report	Transmittal Processing to EDA/COLI		EPACUH Final Approval	
_	474	175	2	4/6	477	478		4/9	480		481	482		483	484	495	3	486	487		8	

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# OU4 Phase I RFI/RI PROJECT

	RFI/RI Report
9/7/93 [CDIVEPA Final Approval)	BRA HHRA TM7 (Critical Path)
	EE Data Validation
7/30/93	EE Lab Turnaround
6/15/01	Data Validation (RI)
10011	Lab Turnaround (RI)
12/15/92	EE Field Work
5/17/93 5/17/93	Field work (annung sampung)
12/14/92	Fald Wast (delling/amp)
8/17/94	Phase I REI/RI
• 3/17/94 • 8/17/94	Projected IAC MS
	Original IAG MS
• 5/21/93 • 10/10/93	
Aug Sep Oct Nov Dec Jan Feb Mar Apr May Jun Jul Aug Sept Oct Nov Dec Jan Feb Mar Apr May Jun Jul Aug Sept Oct	
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# OU4 - SOLAR PONDS STRATEGY FOR IAG COMPLIANCE



### ATTACHMENT G - CRITICAL SCHEDULE ASSUMPTIONS

HORIZONTAL DRILLING - In the event horizontal drilling is required, the target and committment schedules will require revision. Revisions will reflect the additional time necessary to develop a related plan, to mobilize new equipment, and to perform the work.

**DOCUMENTATION REVIEW** - All agency review cycles, as referenced in the attached schedule, must be maintained.

LABORATORY DURATIONS - Radiological analysis are assumed to require 75 working days, as referenced in the Target schedule.

DATA VALIDATION - Data Validation is assumed to require 45 days, as referenced in the target schedule.

TECHNICAL MEMORANDA - It is assumed that only those technical memoranda currently identified in the schedule will be required.